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10 **UNITED STATES BANKRUPTCY COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12 **SACRAMENTO DIVISION**

13 In re

14 Case No. 1:16-bk-10015-FEC

15 SOUTHERN INYO HEALTHCARE  
16 DISTRICT,  
17 Debtor.

18 Chapter 9

19 WGG-5

20 **THIRD JOINT STIPULATION REGARDING  
21 THE CONTINUED HEARING ON SECOND  
22 AMENDED DEBTOR'S MOTION FOR  
23 ORDER ESTIMATING CONTINGENT OR  
24 UNLIQUIDATED CLAIMS UNDER 11  
25 U.S.C. SECTION 502(c)**

26 Current Hearing Date:

27 Date: April 14, 2020  
28 Time: 9:00 a.m.  
Place: 501 I. Street  
Sacramento, CA  
Courtroom 28

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1 **TO THE HONORABLE FREDRICK E. CLEMENT, UNITED STATES BANKRUPTCY  
2 JUDGE, AND ALL OTHER INTERESTED PARTIES:**

3                   Southern Inyo Healthcare District ("District"), Healthcare Conglomerate Associates,  
4 LLC ("HCCA"), and Vi Healthcare Finance, Inc. ("Vi," collectively with the District and  
5 HCCA, the "Parties"), submit this Third Joint Status Report Regarding the Continued  
6 Hearing on the Second Amended Debtor's Motion for Order Estimating Contingent or  
7 Unliquidated Claims Under 11 U.S.C. Section 502(c) ("Status Report").

8                   The District filed a chapter 9 bankruptcy petition in this district, commencing case  
9 number 1:16-bk-10015-FEC, on January 4, 2016. An Order for Relief Under Chapter 9  
10 was issued by the Court on July 12, 2016.

11                  On October 22, 2019, the District filed its Second Amended Debtor's Motion for  
12 Order Estimating Contingent or Unliquidated Claims Under 11 U.S.C. Section 502(c)  
13 ("Motion"). On October 30, 2019, HCCA and Vi filed an application to continue the  
14 hearing on the Motion ("Application to Continue"). The Application to Continue was  
15 approved by order entered on October 31, 2019, and the hearing on the Motion was  
16 continued to December 17, 2019 at 9:00 a.m.

17                  Based upon the fact that the Parties had reached a settlement of their disputes,  
18 including the Motion, and were documenting that settlement, on November 20, 2019, the  
19 Parties filed a Stipulation to Continue the Hearing on the Motion ("Stipulation"), which was  
20 granted by order entered on November 21, 2019. The hearing on the Motion was  
21 continued to January 7, 2020. The Court then continued the hearing on the Motion to  
22 January 28, 2020 at 9:00 a.m.

23                  At the hearing on January 28, 2020, the Parties had not finalized and documented  
24 their agreement. As a result, the Court continued the hearing on the Motion to February  
25 25, 2020, at 9:00 a.m. and ordered the Parties to file a joint status report if the Motion had  
26 not been withdrawn.

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1       On February 11, 2020, the Parties filed a joint status report requesting the Court  
2 continue the Motion for another thirty days while the Parties finalize the documentation of  
3 the agreement. At the hearing on February 25, 2020, the Court continued the hearing on  
4 the Motion to April 14, 2020.

5       The Parties are still working on finalizing the documentation of the settlement  
6 agreement. The Parties believe that another short continuance is necessary to finalize the  
7 settlement agreement between the Parties.

8       Therefore, the Parties request that the hearing on the Motion be continued for thirty  
9 (30) days, which will allow the Parties to complete and execute a settlement agreement.

10      Dated: March 31, 2020

WEILAND GOLDEN GOODRICH LLP

12      By: /s/ Jeffrey I. Golden  
13            JEFFREY I. GOLDEN  
14            BETH E. GASCHEN  
15            RYAN W. BEALL  
16            Attorneys for Debtor  
17            Southern Inyo Healthcare District

18      Dated: March 31, 2020

WANGER JONES HELSEY PC

19      By:   
20            OLIVER W. WANGER  
21            Attorneys for Healthcare  
22            Conglomerate Associates, LLC and  
23            Vi Healthcare Finance